

# PROPOSAL EVALUATION

## Proposition 50, Chapter 8

### Integrated Regional Water Management Grant Program

### Implementation Step 2 Proposals

**PIN:** 9610  
**Applicant Name:** Mojave Water Agency  
**Project Title:** Mojave Water Agency Integrated Regional Water Management Plan

**Funds Requested:** \$ 25,000,000  
**Total Project Cost:** \$ 48,594,500

<b>Total Proposal Score:</b>	<b>93</b>
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**Description:** The proposal implements four high priority projects identified in the region's IRWMP adopted by the Mojave Water Agency and stakeholders. The projects include regional water conservation, groundwater recharge and storage and invasive non-native plant removal. The projects improve the region's water quantity and water quality resources.

***Question: Adopted IRWMP and Proof of Formal Adoption*** 5

The IRWMP and an associated Programmatic EIR was adopted on February 24, 2005.

***Question: Description of Region*** 5

The IRWMP does a good job in addressing all criteria pertaining to the description of the region. The applicant directs readers to specific locations (page numbers, etc.) in the IRWMP where each criterion is addressed. The criteria are addressed thoroughly in a logical and well thought-out manner.

***Question: Objectives*** 5

The IRWMP addresses thoroughly all criteria pertaining to the plan objectives. The applicant directs readers to specific locations (page numbers, etc.) within the IRWMP where each criterion is addressed. IRWMP Table 7-1 is an overview of Demand Management Measures that highlights water management conflicts, issues, and challenges in the region.

***Question: Water Management Strategies and Integration*** 4

The applicant discusses water management strategies and integration in IRWMP Chapters 9 and 10 and in Attachment 5, Sections D and E. The primary water management strategies to be employed are water supply reliability, groundwater management, water quality protection and improvement, conjunctive use of imported water, areas of potential storm retention, and land use planning. Most strategies involve recharge, but there is no discussion of recreation and public access. The IRWMP does not discuss why a strategy is not used.

***Question: Priorities and Schedule*** 5

Priorities and schedule are discussed in detail in IRWMP Chapters 9 and 10 and in Attachment 5, Section F. Priorities discuss key water management issues and issues common to all stakeholders. Short- and long-term priorities are discussed and shown in Tables 9-9 and 9-42. High priority projects, including projects in this proposal, will be implemented within the next four years. Moderate priority projects and actions will be implemented in the next five to ten years. Lower priority projects will be implemented in the next 10 to 20 years. Monitoring, improving basin understanding and public participation are on-going efforts which extend over the entire span of the IRWMP. Chapter 10 addresses how IRWMP will use a responsive decision making process, assess projects, and project sequencing.

***Question: Implementation*** 5

The applicant discusses institutional structure issues in IRWMP Chapters 9 and 10. IRWMP includes 10 projects broken into three priorities. The applicant appears committed to the implementation of these projects since: 1) its providing 39% match monies, 2) a PEIR was adopted in February 2005, 3) individual environmental reviews have begun on all seven Priority 1 projects, and 3) feasibility studies and preliminary project tasks have already been initiated. For most of the projects the scope of work is related to water supply, i.e. groundwater recharge projects intended to alleviate some of the regional needs to import water supplies in the future and partially to restore groundwater levels.

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#### ***Question: Impacts and Regional Benefits***

4

Impacts and benefits are evaluated in IRWMP Chapter 9 with the use of a regional model and within the PEIR. The IRWMP discusses the advantages of regional versus local efforts, interregional benefits and impacts, and benefits to DACs which are expanded upon in Attachment 10. The application would have scored higher for this criterion if the IRWMP had elaborated in more detail on any potential negative impacts of implementation and discussed the overlapping benefits of implementing all 10 projects.

#### ***Question: Technical Analysis and Plan Performance***

5

Technical analyses are discussed in IRWMP Chapter 9. Reference is made in IRWMP to needing more data, such as well data. The applicant states that additional monitoring wells would help evaluate differences in water quality between the two aquifers, the Floodplain Aquifer and the Regional Aquifer. Plan performance and monitoring systems are addressed in IRWMP Chapter 10.

#### ***Question: Data Management***

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Data management is discussed in IRWMP Chapter 10. The USGS, in cooperation with the applicant, maintains a database to store river flow, water quality, and water level data that will be significantly expanded through the implementation of the IRWMP. The applicant's relational database (GIS) is configured to support the needs of other regulatory and planning agencies that include DWR and RWQCB. The applicant expresses an interest and willingness to make compiled data available to stakeholders.

#### ***Question: Financing***

5

The IRWMP relies on an array of financing mechanisms, such as bonds, grants, or low interests loans. The applicant discusses in detail potential funding sources through cost-share agreements between agencies, cooperative funding agreements, and other cost savings through conservation and water reuse. The applicant has adopted four management actions related to IRWMP financing to secure future implementation financing. Financing for O&M costs is also addressed.

#### ***Question: Relation to Local Planning & Sustainability***

5

IRWMP Chapter 10 and Attachment 5, Sections L and M, provide a discussion of local planning and sustainability. The IRWMP incorporates all required elements of an IRWMP, GWMP, and UWMP. The applicant demonstrates coordination at all local levels, that projects relate to local planning agencies, and that the IRWMP relates to the IRWM water management strategies.

#### ***Question: Stakeholder Involvement & Coordination***

5

Stakeholder involvement and coordination is discussed in IRWMP Chapters 7, 8, and 10 and in Attachment 5, Sections N and O. The applicant has developed and implements the IRWMP with comprehensive involvement of stakeholders through a collaborative regional process. EJ concerns and DAC involvement in the planning process are adequately covered.

<b>Weighted IRWMP Total Score:</b>	<b>29</b>
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#### ***Question: Work Plan***

6

The maps provided are helpful in locating the projects and references to the IRWMP clarify the priorities of the projects and their relationship to management strategies. However, the goals and objectives in the work plan need to be: 1) more detailed, 2) more specifically tied to each project, and 3) measurable. Due to the relatively undeveloped stage of the major construction projects, work items for each project are general with several key details absent, such as design parameters and standards, specific permits required and status, land acquisition requirements, and PAEP or monitoring plan. The status of CEQA for the invasive weed eradication project is unknown. The work item submittals are limited to regular progress report during construction. CESA Incidental Take, Lake and Streambed Alteration Agreement, and other permits may be necessary.

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#### ***Question: Budget***

2

The summary budget agrees with the work items. However, the detailed budgets do not contain supporting documentation, so the reasonableness of costs cannot be determined. Detailed budgets for the recharge projects contain numerous inconsistencies; for example, the number of wells to be constructed in the work plan differs from the budget. Permit and environmental costs should have been included for the invasive weed removal project.

#### ***Question: Funding Match***

4

The funding match is at 49% of the total proposal costs.

#### ***Question: Schedule***

4

The schedule contains the general categories identified in the work plans, but many of the work items needed to implement each of the projects are not included. All projects are scheduled to begin construction or implementation before December 2007. However, the schedule does not seem reasonable. The construction period for the recharge projects spans two seasons and appears to be optimistic. The permitting period for those projects appears too short, especially if Highway Encroachment Permits, CESA Incidental Take Permits, and Lake and Streambed Alteration Agreements are needed. The land acquisition and easement schedule appears compressed for condemnation process. The schedule is missing monitoring for one of the projects and does not include monitoring or evaluation after construction/implementation.

#### ***Question: Scientific and Technical Merit***

6

Scientific merits for the recharge projects are well documented to support the storage capability of the underground aquifers. However, documentation regarding operation of the proposed recharge facility; the projects' ability to alleviate the basin's overdraft; and management of the accumulation of TDS in the Mojave floodplain are absent. Numerous documents support the scientific and technical merits of the water conservation program. Details of operation, execution, and projected water conservation for the invasive weed eradication project are not provided. A discussion of data gaps is missing.

#### ***Question: Monitoring, Assessment and Performance Measures***

4

The applicant provides the required Project Performance Measure Tables. Conceptually, the approach is appropriate. However, information could have been more detailed and more specific performance measures identified.

#### ***Question: Economic Analysis***

12

The PV of the costs is \$55 million. The PV of the benefits is \$131.5 million. It is unclear whether all distribution system and O&M costs are included in the costs. The benefits may be somewhat overstated. Almost all of the benefits (99%) are avoided costs. The no proposal alternative assumption is based on construction of a regional water treatment plant and injection/extraction wells. The proposed project and the alternative assumption are not strictly comparable. With growth, the proposal may not eliminate overdraft, so its long-run costs may be understated. However, as long as this project is part of the least-cost solution to the adjudication, the proposal is an economically viable project.

#### ***Question: Other Expected Benefits***

4

The Other Expected Benefits include ecosystem restoration and habitat improvement, in-stream flow improvements, water storage for fire suppression, supporting orderly growth according to local plans, and improvements to the local economy by supporting the development of 85,000 households. However, there is not sufficient information to support with certainty that the proposal will provide the all benefits claimed. Overall, the Other Expected Benefits are low to average.

#### ***Question: Program Preferences***

4

The applicant claims that the proposal will implement one or more Program Preferences. However, it is not certain that all claimed Program Preferences will be achieved for all projects. The certainty of improved water supply reliability is not fully demonstrated. The proposal could achieve its goal; but it is unclear whether there is enough additional water supplies to support both estimated future population growth and reverse existing groundwater overdraft. The proposal includes groundwater management and recharge projects that meet the Program Preference criteria for such projects.

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***Question: Statewide Priorities***

**18**

Some Statewide Priorities are generally addressed. The Statewide Priorities include water rights, EJ concerns, TMDLs, the NPS Plan, and Delta Water Quality Objectives. The proposal implements the physical solution of adjudication and, as such, reduces, with some degree of certainty, water use conflicts. The benefits to the Delta appear questionable and are not well supported.

<b>Total Proposal Score:</b>	<b>93</b>
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